

FRONTIER LAW CENTER

Robert L. Starr (183052)
robert@frontierlawcenter.com
Adam M. Rose (210880)
adam@frontierlawcenter.com
Karo G. Karapetyan (318101)
karo@frontierlawcenter.com
Manny Starr (319778)
manny@frontierlawcenter.com
23901 Calabasas Road, Suite 2074
Calabasas, California 91302
Telephone: (818) 914-3433
Facsimile: (818) 914-3433

POMERANTZ LLP

Jordan L. Lurie (130013)
jlurie@pomlaw.com
Ari Y. Bassar (272618)
abassar@pomlaw.com
1100 Glendon Avenue, 15th Floor
Los Angeles, CA 90024
Telephone: (310) 432-8492
Facsimile: (310) 861-8591

Attorneys for Plaintiff Gor Gevorkyan

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

Gor Gevorkyan on behalf of himself and all
others similarly situated,

Plaintiff,

vs.

Bitmain, Inc., Bitmain Technologies, Ltd.
and DOES 1 to 10,

Defendants.

THE MARLBOROUGH LAW FIRM, P.C.

Christopher Marlborough (298219)
chris@marlboroughlawfirm.com
445 Broad Hollow Road, Suite 400
Melville, NY 11747
Telephone: (212) 991-8960
Facsimile: (212) 991-8952

Case Number: 3:18-cv-07004-JD

**DECLARATION OF MANNY STARR
IN SUPPORT OF PLAINTIFF'S
SECOND SUPPLEMENTAL BRIEF IN
OPPOSITION TO DEFENDANT'S
MOTION TO DISMISS FOR LACK OF
PERSONAL JURISDICTION**

DECLARATION OF MANNY STARR

I, Manny Starr, declare as follows:

1. I am a citizen of Los Angeles, California at all times relevant. I am acting counsel for the named Plaintiff, Gor Gevorkyan ("Plaintiff"). I make this declaration in support of Plaintiff's Second Supplemental Brief In Opposition To Defendant's Motion To Dismiss For Lack Of Personal Jurisdiction. If called as a witness, I could and would testify competently to the following facts, all of which are within my own personal knowledge.

2. Attached hereto as **Exhibit 1** is a true and correct copy of the transcript of the hearing that took place on December 19, 2019.

3. Attached hereto as **Exhibit 2** are the relevant excerpts of the deposition of Gang Ren.

4. Attached hereto as **Exhibit 3** is a true and correct copy of Plaintiff Gor Gevorkyan's invoice for the sale of Antminer S9 ASIC devices.

5. Attached hereto as **Exhibit 4** is a true and correct copy of the December 22, 2020 Riot Blockchain 8-K filing.

6. Attached hereto as **Exhibit 5** is a Bitmain blog post from March 15, 2021.

7. Attached hereto as **Exhibit 6** is the LinkedIn Page of Tianlin (Irene) Gao.

8. Attached hereto as **Exhibit 7** is a true and correct copy of the declaration of Luyao Liu filed in the United States District Court Southern District of Florida Miami Division, Case no. 1:18-CV-25106-KMW.

9. I declare under penalty of perjury under the laws of the United States and the State of California that the foregoing is true and correct and that this Declaration was executed on this 4th day of October 2021, in Los Angeles, CA.

/s/ Manny Starr
Manny Starr